

GUIDELINES FOR JURY INSTRUCTIONS IN CIVIL CASES

Judge Mary H. Murguia

The parties must submit a joint list of proposed jury instructions. The list must contain the following sections.

I. Section I must contain Ninth Circuit Model Civil Jury Instructions Used by All Arizona Judges as found at www.azd.uscourts.gov under Judicial Officer information. If a model instruction is requested by both parties, the the instruction must be preceded by “ST” (stipulated-to). If the instruction is requested by only one party, the the instruction must be preceded by either “PL” (Plaintiff) or “DF” (Defendant).¹ For example:

ST § 3.1 Duties of Jury to Find Facts and Follow Law

ST § 3.2 What is Evidence

DF § 3.3 What is Not Evidence

DF § 3.4 Jury to be Guided by Official English Interpretation

ST § 3.5 Direct and Circumstantial Evidence

PL § 3.6 Credibility of Witnesses

DF § 3.7 Opinion Evidence Expert Witnesses

ST § 3.8 Causation

ST § 3.9 Charts and Summaries Not Received in Evidence

ST § 3.10 Charts and Summaries in Evidence

DF § 3.11 Two or More Parties - Different Legal Rights

DF § 3.12 Impeachment Evidence - Witness

The parties must include the full text of all model instructions in the joint pleading.

II. Section II must contain any non-model instructions to which the parties have stipulated.

III. Section III must contain any non-model instructions requested by Plaintiff (numbered consecutively). Plaintiff must include citation to authority to support the requested instruction. Defendant must state all objections to such instruction immediately following the instruction and Plaintiff’s authority. Defendant must support any objection with citation to authority. If Defendant offers an alternative

¹If there are multiple Defendants, identify which Defendant is requesting the particular instruction.

1 instruction, then such alternative instruction must immediately
2 follow Defendant's objection.

3 IV. Section IV shall contain any non-model instructions requested by
4 Defendant (numbered consecutively). Defendant must include
5 citation to authority to support the requested instruction. Plaintiff
6 must state all objections to such instruction immediately following
the instruction and Defendant's authority. Plaintiff must support any
objection with citation to authority. If Plaintiff offers an alternative
instruction, then such alternative instruction must immediately
follow Plaintiff's objection.

7 Each proposed instruction must begin on a new page.

8 The parties should note that absent a showing of good cause, the failure to submit a
9 proposed instruction or make an objection in the joint pleading by the deadline set forth in
10 the Order Setting Final Pretrial Conference will result in the instruction being refused or
the objection deemed waived.